

**BACHNER & ASSOCIATES, P.C.**

ATTORNEYS AT LAW  
111 BROADWAY  
SUITE 701  
NEW YORK, NEW YORK 10006

—  
TELEPHONE: (212) 344-7778

FACSIMILE: (212) 344-7774  
—

[www.bhlawfirm.com](http://www.bhlawfirm.com)

MICHAEL F. BACHNER\*  
\*ALSO ADMITTED IN NJ

NEW JERSEY OFFICE  
18 METZGER DRIVE  
WEST ORANGE, NJ 07052

April 3, 2023

**VIA ECF**

Hon. Paul G. Gardephe  
US District Court Judge  
Southern District of New York  
40 Centre Street  
New York, New York 10007-1312

**Re: USA v. James Zhong, 22 Cr. 606-001 (PGG)**

Dear Judge Gardephe:

My office just received the attached three letters written on behalf of Mr. Zhong who is scheduled to be sentenced on April 14, 2023.

Respectfully,

/s/ *Michael Bachner*

Michael F. Bachner

Cc: Government counsel (via ECF and email)